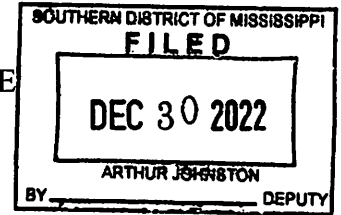


IN THE UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF MISSISSIPPI
~~EASTERN DIVISION~~
SOUTHERN



VANCE BRADLEY

Plaintiff

V.

CAUSE NO: 1:22-cv-355-HSO-BWR

UNITED STATES POSTAL SERVICE

Defendant

JURY TRIAL DEMANDED

COMPLAINT

This is an action to recover actual and non-pecuniary damages under the Federal Tort Claims Act. The following facts support the action:

1.

Plaintiff, Vance Bradley is an adult resident citizen of Greene County, Mississippi who may be contacted through undersigned Counsel.

2.

Defendant, United States Postal Service (hereinafter "USPS") is a government entity organized under the laws of the United States who may be served with process through its General Counsel at 1720 Market St., Room 2400 St. Louis, Missouri 63155.

3.

This court has jurisdiction under 28 U.S.C. § 1331 and the Federal Tort Claims Act.

4.

Plaintiff has filed previously sent a notice of claim to the Defendant along with several follow up conversations. Exhibit A. No response has ever been received.

5.

On or about April 5, 2020 Plaintiff was riding his motorcycle on Deer Park Road in Green County.

6.

Immediately prior to Plaintiff riding down the road, without permission and unknown to the owners of the property, a USPS employee released a dog that was being kept on a leash at or near the property located at 288 Deer Park Road.

7.

The dog ran off and into the path of Bradley, who hit the dog and wrecked his motorcycle.

8.

As a result of the crash, Plaintiff was severely injured.

9.

The USPS employee knew or should had known that releasing a leashed dog near a roadway was likely to cause disruption and wreck on the roadway.

10.

At the very least, the USPS employee was negligent.

12.

As a result of the Defendant's conduct, Plaintiff has incurred severe damages, injuries, and suffered extreme pain and emotional distress as well as a loss of enjoyment of life.

13.

As a result, Bradley is entitled to damages.

14.

As a result of the Defendant's actions, Plaintiff has endured severe emotional distress, anxiety, stress, pain, suffering and loss of enjoyment of loss.

PRAYER FOR RELIEF

Plaintiff prays for actual, compensatory, special, and punitive damages in the amount to be determined by a jury, injunctive relief and for reasonable attorney's fees.

THIS the 30 day of December 2022.

Respectfully submitted,

VANCE BRADLEY, PLAINTIFF



DANIEL M. WAIDE, MSB #103543

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